1 2	RANDAL R. LEONARD, ESQ. Nevada Bar No. 6716 2901 El Camino Avenue, #200		
3	Las Vegas, Nevada 89102 (702) 598-3667/ office		
4	(702) 598-3926/ facsimile Attorney for Plaintiff		
5	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
6	DIEGO M. GALIETTI, an individual,		
7			
8	Plaintiff, vs. Case No.: 2:21-cv-2034-APG BNW		
9	WESTERN PROGRESSIVE-NEVADA, INC.;		
10	CITIBANK, N.A., as Trustee of the American Home Mortgage Investment Trust 2004-3,		
11	Mortgage Backed Notes, Series 2004-3; and DOES		
12	I THROUGH X inclusive; and ROE CORPORATION XX through XXX, inclusive,		
13	Defendants.		
14	STIPULATION TO EXTEND TIME TO RESPOND TO DEFENDANTS' SUPPLEMENTAL BRIEF AND MOTION TO DISMISS		
15			
16	(First Request)		
17	Plaintiff, Diego M. Galietti (Galietti), and Defendants Western Progressive-Nevada, Inc		
18	(Western Progressive), and Citibank, N.A., as Trustee of the American Home Mortgage		
19	Investment Trust 2004-3, Mortgage Backed Notes, Series 2004-3 (Citibank), by and through		
20	their counsel, hereby stipulate and agree as follows:		
21	Western Progressive and Citibank together filed on June 17, 2022 a Motion to		
22	Dismiss and a Supplemental Brief (docket nos. 50 and 51).		
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24	2. Galietti's deadline to file responsive pleadings to the above is July 1, 2022 currently.		
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1	3. Even so the parties, Galietti, Western Progressive and Citibank agree to e	
2	time for Galietti to respond to the	ne Motion to Dismiss and Supplemental Brief to July
3	15, 2022.	
4	4. This is the first motion for an ex	atension of time for Galietti to file responses to the
5		nental Brief. The extension is requested in good fait
6		ay or prejudice to any party to this action.
7		ay of prejudice to any party to this action.
8	Dated this 1 st day of July 2022.	
9	/s/ Randal R. Leonard, Esq. RANDAL R. LEONARD, ESQ.	/s/ Ramir M. Hernandez, Esq. Ramir M. Hernandez, Esq.
10	Nevada Bar No. 6716 2901 El Camino Avenue, #200	Nevada Bar No. 13146 7785 W. Sahara Ave., Suite 200
11	Las Vegas, Nevada 89102	Las Vegas, Nevada 89117
12	(702) 598-3667/ office (702) 598-3926/ facsimile	(702) 475-7964 (702) 946-1345 fax
13	Attorney for Plaintiff	Attorneys for Defendants
14		
15		
16		IT IS SO ORDERED:
17		
18		and
19		UNITED STATES DISTRICT JUDGE
20		DATED:July 5, 2022
21		DATED:
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